

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL  
LEAGUE PLAYERS' CONCUSSION  
INJURY LITIGATION

Kevin Turner and Shawn Wooden,  
*on behalf of themselves and  
others similarly situated,*  
  
Plaintiffs,

v.

National Football League and  
NFL Properties LLC,  
successor-in-interest to  
NFL Properties, Inc.,  
  
Defendants.

THIS DOCUMENT RELATES TO:  
ALL ACTIONS

No. 2:12-md-02323-AB

MDL No. 2323

**Hon. Anita B. Brody**

Civ. Action No. 14-00029-AB

**CO-LEAD CLASS COUNSELS' PETITION FOR AN AWARD OF ATTORNEYS' FEES,  
REIMBURSEMENT OF COSTS AND EXPENSES, ADOPTION OF A SET-ASIDE OF  
FIVE PERCENT OF EACH MONETARY AWARD AND DERIVATIVE CLAIMANT  
AWARD, AND CASE CONTRIBUTION AWARDS TO CLASS REPRESENTATIVES**

Co-Lead Class Counsel respectfully move, pursuant to Rule 23(h) of the Federal Rules of Civil Procedure and Section 21.1 of the Class Action Settlement Agreement, as amended (ECF No. 6481-1) ("Settlement") for the entry of an Order (i) awarding attorneys' fees and reimbursement of costs and litigation expenses for their work to date in this litigation; (ii) conferring upon Co-Lead Counsel Christopher A. Seeger the responsibility and discretion to make the allocation of the attorneys' fees and costs and expenses award among those Plaintiffs' Counsel seeking compensation for common benefit work and common benefit costs and expenses incurred; (iii)

adopting a set-aside of five percent of each Monetary Award and Derivative Claimant Award under the Settlement, for the purpose of reimbursing counsel for future common benefit work and expenses in connection with implementation of the Settlement; and (iv) making case contribution (or incentive or service) awards to the three representatives of the settlement Class (or, where appropriate, to their estates) for their invaluable contributions in connection with the achievement of the Settlement.

The reasons supporting these requests are fully set forth in the accompanying memorandum of law and the Declaration of Christopher A. Seeger, dated February 13, 2017, and exhibits thereto. A proposed Order is submitted herewith.

Dated: February 13, 2017

Respectfully submitted,

s/ Christopher A. Seeger  
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***Co-Lead Class Counsel***

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served on all counsel of record via the Court's ECF system on February 13, 2017.

s/ Christopher A. Seeger  
Christopher A. Seeger